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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

15 ANGELA WILLIAMS; JANE DOE #1; JANE
DOE #2,

CASE NO.: 2:21-cv-01676-APG-VCF

16 | Plaintiffs,

17 | v.

18 STEVE SISOLAK, Governor of Nevada, in his
19 official capacity; AARON FORD, Attorney
General of Nevada, in his official capacity;
20 THE CITY OF LAS VEGAS; CLARK
COUNTY; NYE COUNTY; WESTERN
BEST, INC. D/B/A CHICKEN RANCH;
WESTERN BEST LLC; JAMA RASHID;
21 MALLY MALL MUSIC, LLC; FUTURE
MUSIC, LLC; PF SOCIAL MEDIA
MANAGEMENT, LLC; E.P. SANCTUARY;
22 BLU MAGIC MUSIC, LLC; EXCLUSIVE
BEAUTY LOUNGE, LLC; FIRST
INVESTMENT PROPERTY, LLC; V.I.P.
23 ENTERTAINMENT, LLC; MP3
PRODUCTIONS, INC.; MMM
24 PRODUCTIONS, INC.;

**STIPULATION AND [PROPOSED]
ORDER STAYING DISCOVERY
PENDING RULING ON DISPOSITIVE
MOTIONS**

1 SHAC, LLC D/B/A SAPPHIRE
2 GENTLEMAN'S CLUB AND/OR
3 SAPPHIRE; SHAC MT, LLC; and LAS
VEGAS BISTRO, LLC D/B/A LARRY
FLYNT'S HUSTLER CLUB,

4 Defendants.

5
6 COME NOW Plaintiffs Angela Williams; Jane Doe #1; and Jane Doe #2, by and through
7 their counsel of record, Hutchison & Steffen, PLLC, Defendants Steve Sisolak, Governor of
8 Nevada and Aaron Ford, Attorney General of Nevada, by and through their counsel of record The
9 Nevada State Attorney General's Office, The City of Las Vegas by and through their counsel of
10 record The Las Vegas City Attorney's Office, Clark County by and through its counsel of record
11 Clark County District Attorney Civil Division, Nye County by and through its counsel of record
12 Thorpe & Swainston, Ltd., Las Vegas Bistro, LLC d/b/a Larry Flynt's Hustler Club by and through
13 its counsel of record Fox Rothschild LLP, Western Best, Inc. d/b/a Chicken Ranch and Western
14 Best LLC by and through its counsel of record Fox Rothschild LLP, SHAC, LLC dba Sapphire
15 Gentleman's Club and/or Sapphire and SHAC, MT, LLC by and through their counsel of record,
16 Casey Wallace, Esq. and William King, Esq. of the alw firm of Wallace & Allen, LLP, and their
17 local counsel of record Lewis Roca Rothgerber Christie, LLP (collectively, the "Parties"), hereby
18 stipulate and agree to the following:

19 1. The following dispositive motions are currently pending before the Court:

- 20 • Defendant Clark County's Motion to Strike or in the Alternative to Dismiss,
21 [ECF 53], joined by Defendants Steve Sisolak and Aaron Ford [ECF 58], City
22 of Las Vegas [ECF 69], Nye County [ECF 71], and Western Best, Inc. d/b/a
23 Chicken Ranch and Western Best LLC) [ECF 99];
24 • Defendants Western Best, Inc. d/b/a Chicken Ranch and Western Best LLC's
25 Motion to Dismiss [ECF 98]; and
26 • Defendants SHAC, LLC dba Sapphire Gentleman's Club and/or Sapphire and
27 SHAC, MT, LLC's Motion to Dismiss [ECF 133].

28 . . .

- 1 2. The Parties agree that all discovery in this action should be stayed pending resolution
2 of these dispositive motions currently before the Court.
3 3. The Plaintiffs and Defendants Western Best, Inc. d/b/a Chicken Ranch and Western
4 Best LLC previously agreed that Plaintiffs' Motions for Protective Orders [ECF 2 and
5 ECF 50] will not be addressed until after the motion to strike and motions to dismiss
6 are fully adjudicated [ECF 117].
7 4. The Parties will agree upon a briefing schedule for protective orders after the Court
8 rules on all the currently pending dispositive motions.
9 5. The Parties will agree upon a revised discovery schedule after the Court rules on all
10 the currently pending dispositive motions.

11 **IT IS SO STIPULATED.**

12 DATED this 28th day of January, 2022.

13 /s/ Jason D. Guinasso
14 Jason D. Guinasso, Esq.
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12 DATED this 28th day of January, 2022.

13 /s/Deanna Forbush
14 Deanna Forbush
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26 and Western Best, Inc. d/b/a Chicken Ranch

21 DATED this 28th day of January, 2022.

22 /s/ Joel K. Browning
23 Joel K. Browning
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22 /s/ Gregory Louis Zunino
23 Gregory Louis Zunino
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29 Attorney for Defendants Aaron Ford and
30 Steve Sisolak

DATED this 28th day of January,
2022.

/s/ Brent Ryman.

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DATED this 27th day of January,
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*Counsel for SHAC, LLC dba
Sapphire Gentleman's Club and/or
Sapphire and SHAC, MT, LLC*

DATED this 28th day of
January, 2022.

/s/ Zachary Youngsma

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*Attorneys for Defendant
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DATED this 28th day
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/s/ Jeffrey Galliher.

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*Attorney for The City
of Las Vegas*

1 New appearing parties may file a motion to lift the discovery stay or to request that briefing
2 commence on the motions for protective order, provided that the motion is filed not later than
3 thirty days after that party's first appearance.

4 **ORDER**

5 **IT IS SO ORDERED.**

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7

UNITED STATES MAGISTRATE JUDGE

8 DATED: 1-28-2022

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ELECTRONIC CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I hereby certify that on this 28th day of January, 2022, a true and correct copy of the foregoing **STIPULATION AND [PROPOSED] ORDER STAYING DISCOVERY** was electronically filed with the United States District Court. Electronic service of the foregoing document shall be made in accordance with the Master Service List as follows:

Defendant

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Governor of Nevada

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Defendant

Aaron Ford
Attorney General of Nevada

represented by **Gregory Louis Zunino**
(See above for address)

Defendant

The City of Las Vegas

represented by **Jeffrey L Galliher**
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Defendant

Defendant
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10 **Defendant**

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12 Larry Flynt's Hustler Club

13 represented by **Zachary Youngsma**

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21 **Defendant**

22 Western Best Inc. D/B/A
23 Chicken Ranch

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30 **Defendant**

SHAC, LLC d/b/a Sapphire

1 Gentlemen's Club and/or Sapphire

2 Represented by: **Ogonna M. Brown**
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11 **Defendant**

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